

IN THE UNITED STATES DISTRICT COURT
FOR THE Middle DISTRICT OF GEORGIA
Valdosta DIVISION

Tamara J. Henderson
1002250536
Petitioner

VS.

CIVIL ACTION NO. 7:19-CV-191
CRIMINAL CASE NO. _____

Terry E. Barnard
Brian Owens
Rick Jacobs

Respondent(s)

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11:45 AM
11-13-19

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COMPLAINT UNDER FREEDOM OF INFORMATION ACT
[5 USCA §552(a)(4)(B)], AND OCGA §50-18-70
TO 50-18-75.

I.

This request Petition is brought under the Freedom of Information Act, as amended [5 USCA §552(a)(4)(B), and OCGA §50-18-70 to 50-18-75, and seeks preliminary and final injunction against withholding certain information from plaintiff and directing that it be disclosed.

II.

Plaintiff is an inmate at the Valdosta State Prison Ga. The Defendant(s) are Terry Barnard, Brian Owens, Rick Jacobs State Board of Pardons and Parole at Atlanta, Georgia.
Venue of this action is properly laid in this court.

III.

Defendant Terry E. Barnard maintains certain records consisting of State of Georgia Board of Pardons and Parole's Rules, Policies and Regulations which relate to Please see attach Exhibit A and in

which plaintiff has an interest by reason of Please see Exhibit A
On or about 8-1-2019, 20019. Plaintiff duly
requested in writing that Mr. Terry G. Bernard through the
appropriate officer or employee, disclose the records mentioned above
to plaintiff. The request has not been honored as of this date,
11-7-2019, 20019.

IV.

~~above mentioned~~ defendant's are Employed
By State Board of Pardons and Paroles
2 Martin L. King Jr Drive Suite 458 East Tower
Atlanta, Ga 30334

V.

Attached as Exhibits "A" and "-" are
copies of the request made by plaintiff and the response by the
defendant/agency.

The records referred to above were and are identifiable records
within the meaning of the Freedom of Information Act. S.O.S.C.S. SS2
SS(CA) and O.C.B.A 5048-10 [agency's] refusal to disclose the
same to plaintiff was wrongful and without lawful reason or excuse,
and plaintiff is entitled provided by the Act.

Wherefore, plaintiff prays:

1. For preliminary and final injunction prohibiting defendants
from withholding from plaintiff the records referred to and described
above.

2. For preliminary and final injunction directing defendants to
make such records available to plaintiff Tavarres S. Henderson [and
plaintiff attorney] Same Pro Se and permit the
inspection and copying of such records.

3. ~~For attorney's fees and costs~~, and for such other and further
relief as to the court may seem proper.

Dated 11-7-2019.

Respectfully Submitted,

Tavarres S. Henderson

Pro se

IV. Parties To This Lawsuit

1. Plaintiff's Petitioner's current Place of incarceration/ mailing address:

Tavarres L Henderson
#1002250536
Valdosta State Prison
P.O box 5368
Valdosta, Ga 31603

2. List the Full name, The official Position and the Place of employment of each defendant in this lawsuit.

Terry E. Barnard Chairman of State Board of Pardon's and Parole's.

2 Martin Luther King, Jr. Drive
Suite 458, East Tower
Atlanta, Georgia 30334

3. List the Full name, The official Position and the Place of employment of each Defendant/Respondent in This Lawsuit.

Brian owens Vice-Chairman of
State Board of Pardon's and Parole's
2 martin Luther King, Jr. Drive
Suite 458, East Tower
Atlanta, Georgia 30334

4. Rick Jacob's Director of Clemency
and Parole's For State of Georgia Board
of Pardon's and Parole's.

2. martin Luther King, Jr. Drive
Suite 458, East Tower
Atlanta, Georgia 30334